No. 94209-9

IN THE
SUPREME COURT OF THE STATE OF WASHINGTON

Certified Question
Propounded by The Hon. Justin L. Quackenbush
United States District Judge (E.D. Wash.)

ZIN ZHU,

Plaintiff,

vs.

NORTH CENTRAL EDUCATIONAL SERVICE DISTRICT NO. 171,

Defendant.

DEFENDANT'S RESPONSE TO BRIEF OF AMICUS CURIAE WASHINGTON STATE ASSOCIATION FOR JUSTICE FOUNDATION

JERRY J. MOBERG, WSBA No. 5282
JAMES E. BAKER, WSBA No. 9459
JERRY MOBERG & ASSOCIATES, P.S.
Attorneys for Defendant
P.O. Box 130 – 124 3rd Avenue S.W.
Ephrata, WA 98823
jmoberg@jmlawps.com
jbaker@jmlawps.com
Phone: (509) 754-2356
Fax: (509) 754-4202

TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Other Authority

A. A LIBERAL CONSTRUCTION OF THE WLAD DOES NOT COMPEL A RETALIATION CAUSE OF ACTION IN THIS CASE.

This Court has repeatedly stated that the WLAD is to be liberally interpreted. The District does not dispute this rule of statutory interpretation. The rule of liberal construction, however, does not mandate a new retaliation cause of action when there is no indication that the Legislature intended to create such a new cause of action. The "plain meaning" of RCW 49.60.210(1) does not create a new retaliation cause of action against a prospective employer who allegedly declines to hire a job applicant because the job applicant alleged race discrimination against a different employer in the past.

The interpretation of the anti-retaliation statute urged by the District does not narrow the coverage of the WLAD. Instead, **the District's interpretation of the statute follows rules of statutory construction and carries out the intent of the Legislature.**

Amici asserted that the District "urges the Court to consider public policy as support for the narrow construction it offers . . . ." (Brief of Amici at 6.) There are, indeed, public policy reasons involved in this case. But the public policy reasons cited by the District are not intended to narrow the law. The public policy reasons support the District's argument

that the Legislature would not have created a new retaliation cause of action without first studying the public policy implications. The legislative history demonstrates that the 1985 amendments were "housekeeping" in nature. The legislative history does not demonstrate a deliberative process to decide whether a cause of action should lie – against all employers in the state of Washington employing eight or more persons -- when such a cause of action did not exist in the past.

Amici repeatedly cited *Holland v. Boeing Co.*, 90 Wn.2d 384, 583 P.2d 621 (1978) (disability discrimination lawsuit brought by employee with cerebral palsy under RCW 49.60.180) and *Marquis v. City of Spokane*, 130 Wn.2d 97, 922 P.2d 43 (1996) (sex discrimination lawsuit under RCW 49.60.180). (Brief of Amici at 4-6, 8, 17.) *Holland* held: "It is an unfair practice for an employer to fail or refuse to make reasonable accommodations to the physical limitations of handicapped employees." 90 Wn.2d at 389. *Marquis* held that "the broad recognition of rights contained in RCW 49.60.030(1) includes the right of an independent contractor to be free of discrimination based on sex, race, national origin, religion, or disability in the making or performing a contract for personal services." 130 Wn.2d at 112-13. *Holland* and *Marquis* are not applicable to a retaliation claim under the facts of this case.

B. THE PLAIN MEANING RULE DOES NOT COMPEL A RETALIATION CAUSE OF ACTION IN THIS CASE.

When interpreting a statute, "the court's objective is to determine the legislature's intent." *State v. Jacobs,* 154 Wn.2d 596, 600, 115 P.3d 281 (2005). "[I]f the statute's meaning is plain on its face, then the court must give effect to that plain meaning as expressed by legislative intent." *Dep't of Ecology v. Campbell & Gwinn, L.L.C.*, 146 Wn.2d 1, 9-10, 43 P.3d 4 (2002). "The 'plain meaning' of a statutory provision is to be discerned from the ordinary meaning of the language at issue, as well as from the context of the statute in which that provision is found." *Jacobs,* 154 Wn.2d at 600. "If, after this inquiry, the statute remains susceptible to more than one reasonable meaning, it is ambiguous and [the court] 'may resort to aids to statutory construction, legislative history, and relevant case law for assistance in discerning legislative intent.'" *State v. Ervin,* 169 Wn.2d 815, 820, 239 P.3d 354 (2010).

Here, the anti-retaliation statute is ambiguous. Therefore, this Court should use statutory construction, legislative history and relevant case law to it to determine whether the Legislature intended the 1985 amendments to create a new retaliation cause of action under the facts of this case.

Statutory construction – Using statutory construction, the application of the *ejusdem generis* rule mandates that the statute be construed to apply only to entities functionally similar to an employer. *See* argument set forth at Section F below.

Legislative history – The legislative history does not suggest that the Legislature intended to create a new retaliation cause of action when it amended the anti-retaliation statute in 1985. *See* the District's discussion of this issue at pp. 7-12 of the District's opening brief and at pp. 8-9 of the District's reply brief. In the District's reply brief it was noted at 8:

> Plaintiff did not directly address the District's argument that the Legislative history of the 1985 amendments does not suggest that the Legislature intended for the statute to apply in the manner advanced by Plaintiff. Plaintiff's entire argument is footnote 2 of Plaintiff's response. Plaintiff simply asserted: "There was no need [for the Legislative history] to mention the addition of job applicant protection when they were already covered by the statute.

Relevant case law – The case law discussing RCW 49.60.210(1) does not suggest that there is a retaliation cause of action under the facts of this case because a retaliation defendant must be the functional equivalent of a plaintiff's employer. *Sambasivan v. Kadlec Med. Center,* 184 Wn.2d 567, 592, 338 P.3d 860 (2014) (independent contractor could sue for retaliation and stating that "under either *Galbraith's* or *Malo's* construction of RCW 49.60.210(1), Kadlec's denial of privileges . . . [to

an independent contractor] . . . is sufficiently equivalent, or derivative of a labor-related activity, to be actionable under the statute."); *Currier v. Northland Servs., Inc.*, 182 Wn.App. 733, 744, 332 P.3d 1006 (2014) (independent contractor could sue for retaliation), *rev. denied* 182 Wn.2d 1006, 342 P.3d 326 (2015); *Malo v. Alaska Trawl Fisheries, Inc.*, 92 Wn.App. 927, 930, 965 P.2d 1124 (1998) (declining to find "or other person" includes co-workers and stating that **the statute "is directed at entities functionally similar to employers"**), *rev. denied* 137 Wn.2d 1029, 980 P.2d 1284 (1999); *Owa v. Fred Meyer Stores*, 2017 WL 897808, *3 (W.D.Wash. 2017) (applying statutory construction used in Malo and stating: "Although no employer-employee relationship is necessary for a claim under [the anti-retaliation statute], **some kind of contractual relationship generally must exist."**); *Woods v. Washington*, 2011 WL 31852, *4 (W.D.Wash. 2011) (Quoting *Malo* and stating: "The section, read as a whole, **is directed at entities functionally similar to employers"**). (Emphasis added.)

After considering rules of statutory construction, legislative history and relevant case law, this Court should conclude that Mr. Zhu does not have a retaliation cause of action under RCW 49.60.210(1).

C. THE USE OF THE WORD "EMPLOYER" IN THE ANTI-RETALIATION STATUTE, DOES NOT COMPEL A

RETALIATION CAUSE OF ACTION IN THIS CASE.

RCW 49.60.210(1) provides:

> It is an unfair practice for any **employer,** employment agency, labor union, or other person to discharge, expel, or otherwise discriminate against any person because he or she has opposed any practices forbidden by this chapter, or because he or she has filed a charge, testified, or assisted in any proceeding under this chapter.

(Emphasis added.)

Amici asserted: "Read in context, the plain meaning of 'employer' includes a prospective employer making hiring-related decisions." (Brief of Amici at 8.) Amici argued that the District was an "employer" as defined by RCW 49.60.040(11) and that the disparate treatment statute, RCW 49.60.180(1), provides that an "employer" may not "refuse to hire any person" due to membership in a protected class. (*Id.*) Citing *Champion v. Shoreline School Dist. No. 412 of King County,* 81 Wn.2d 672, 676, 504 P.2d 304 (1972) (school nurse is not a "certified employee" within the meaning of RCW 28A.67.070), Amici stated: "When the Legislature uses the same word in different but related statutory provisions, the Court assumes the word is intended to have the same meaning." (*Id.* at 8-9.) In affirming the decision of the trial court, this Court in *Champion* noted: "The trial court applied the doctrine of Ejusdem generis to determine the scope of the term 'other certificated employee' as

used in this section, and held that it included only persons having teaching certificates." 81 Wn.2d at 674. This Court further stated at 675:

> Thus, the class is not exhausted by the persons specified in RCW 28A.67.070, and it would appear that under the rule of Ejusdem generis, the legislative intent must have been to extend the benefits of the act only to those persons who are required to hold teaching certificates.

This Court further stated at 680 that it based its decision by "[v]iewing the statute as a whole in pari materia with other statutes . . . and applying the doctrine of Ejusdem generis . . . ." Here, the *ejusdem generis* rule should be applied as in *Malo* and *Owa,* cited above in Section B:

> Applying these principles of statutory construction to the present statute, we hold that the general term "or other person" is restricted by the word "employer," "employment agency" and "labor union."

Malo, 92 Wn.App. at 930; *Owa,* 2017 WL 897808 at *2.

Amici at 10 cited *Galbraith v. TAPCO Credit Union,* 88 Wn.App. 939, 946 P.2d 1242 (1997), *rev. denied* 135 Wn.2d 1006, 959 P.2d 125 (1998), which stated at 950: "Under RCW 49.60.210 'unfair practices' can be committed, not only by employers, but also by any 'other person.'" The *Galbraith* court held that plaintiff, a former member of the defendant credit union, "has an actionable claim against TAPCO for retaliatory discrimination." *Id.* at 951. Plaintiff "offered evidence that he assisted TAPCO employees with their anti-discrimination lawsuit against TAPCO

and that his assistance was a factor in TAPCO's terminating his membership." *Id.* at 952. The *Galbraith* court noted at 950-51:

> Moreover, in spite of the lack of an employment relationship between Galbraith and TAPCO, Galbraith's assistance to the TAPCO employees' discrimination claim against TAPCO was directly related to *their* employment relationship with TAPCO. Thus Galbraith's actions were labor-related, albeit derivative.

(Emphasis in original.)

In *Galbraith,* plaintiff had a relationship with defendant and defendant allegedly retaliated against plaintiff because of plaintiff's protected activity: his assistance of employees of his own credit union. **Plaintiff's protected activity and his credit union's retaliation involved only two actors: plaintiff and his credit union.** The case did not involve protected activity by a plaintiff that took place took place with a different entity. TAPCO did not retaliate against plaintiff because in the past plaintiff engaged in protected activity while a member of a different credit union.

Malo was decided one year after *Galbraith*. In *Malo,* the court applied the rule of *ejusdem generis.* 92 Wn.App. at 930. The *Malo* court noted that plaintiff's co-employee, Campbell, "did not employ, manage or supervise Malo." *Id.* (Here, the District did not employ, manage or supervise Plaintiff.) In footnote 6, the *Malo* court acknowledged

Galbraith for the rule that "liability under RCW 49.60.210 extends to credit unions who discriminate against credit union members engaged in protected activities." The *Malo* court rejected plaintiff's argument "that the statute unambiguously controls the conduct of any 'person' even if that person is not an employer." *Id.* at 930. After applying principles of statutory construction, the *Malo* court held that **the statute "is directed at entities functionally similar to employers"** so the statute "does not create personal and individual liability for co-workers . . . ." *Id.* at 930-31. (Emphasis added.)

D. THE COURT DOES NOT NEED TO READ LIMITING LANGUAGE INTO THE STATUTE TO CONCLUDE THAT THE 1985 AMENDMENTS DID NOT CREATE A NEW RETALIATION CAUSE OF ACTION.

Amici asserted: "Had the Legislature intended to require [an employee-employer] relationship, it could have indicated such a requirement in the text." (Brief of Amici at 11.) But just as easily, if the Legislature intended the anti-retaliation statute to apply to the refusal to hire job applicants due to protected activity taking place in the past with a different employer, it could have indicated such a requirement in the text.

Amici at 12 quoted the district court:

> The fact the Washington Legislature explicitly extended protection to job applicants and prospective employment on no less than six occasions within WLAD could suggest that

> by its silence the Legislature did not intend for job applicants to receive protection under RCW 49.60.210(1).

Zhu v. North Central ESD No. 171, 2016 WL 7428204, *11 (E.D.Wash. 2016). This Court should find that by the Legislature's silence it did not intend for job applicants to receive protection under the statute – particularly when the job applicant's protected activity took place in the past with a different employer.

Amici stated at 13 that "by expressly including employment agencies and labor unions within its reach, § .210(1) clearly contemplates protection for job applicants, as the 'persons' suffering discrimination would obviously include job applicants." Such is not obvious when the alleged retaliation is based upon a job applicant's protected activity that took place with a different entity before applying for work with a labor union or an employment agency. A labor union or an employment agency can retaliate against persons who are not job applicants. *See, e.g., Fields v. Teamsters Local Union No. 988,* 23 S.W.3d 517 (Tex.App. 2000) (retaliation cause of action by former employee of a local union against the union based upon the union retaliating against plaintiff for reporting sexual harassment by a union trustee); *Mathieu v. Norrell Corp.*, 115 Cal.App.4th 1174, 10 Cal.Rptr. 52 (Cal.App. 2004) (retaliation cause of action by a temporary employee against an employment agency based

upon the employment agency's termination of plaintiff after she complained of sexual harassment).

E. THE ANTI-RETALIATION STATUTE DOES NOT APPLY TO THE DISTRICT BECAUSE THE DISTRICT WAS NOT THE FUNCTIONAL EQUIVALENT OF AN EMPLOYER OF MR. ZHU.

A proper defendant under the anti-retaliation statute is an employer or an entity that is the functional equivalent of an employer. The District's argument is based upon the case law set forth at §§ B and F of this brief, pp. 11-14 of the District's opening brief and pp. 7, 11 and 18 of the District's reply brief.

F. APPLICATION OF THE EJUSDEM GENERIS DOCTRINE DOES NOT CONTRAVENE THE LIBERAL CONSTRUCTION REQUIREMENT OF THE WLAD.

Amici stated that the *ejusdem generis* rule should be rejected for three reasons:

> First, application of the doctrine would fail to read the phrase "other person" in its full context, disregarding related WLAD statutes that shed light on the consideration of 'other person." Second, ejusdem generis may arguably render "other person" meaningless. . . . Third, the Legislature has mandated that WLAD provisions be construed liberally.

(Brief of Amicus at 16.) The reasons advanced by Mr. Zhu do not require the rejection of the *ejusdem generis* rule.

Failing to read the phrase "other person" in context argument – The anti-retaliation statute is not interpreted out of context by finding that the use of the term "or other person" is restricted by the words "employer," "employment agency" and "labor union." This is particularly true when there is no indication that the Legislature intended the 1985 amendments to create a new retaliation cause of action under the facts of this case.

Rendering of the term "other person" meaningless argument – The use of the term "or other person" is not meaningless because it clarifies that an employer, employment agency or labor union can be vicariously liable for the acts of a person who is employed by an employer, employment agency or labor union.

Liberal construction of the WLAD argument -- The *ejusdem generis* rule has been applied by the courts when interpreting the statute at issue. In *Malo v. Alaska Trawl Fisheries, Inc.*, 92 Wn.App. 927, 965 P.2d 1124 (1998), *rev. denied* 137 Wn.2d 1029, 980 P.2d 1284 (1999), the Court of Appeals read RCW 49.60.210(1) as a whole and applied the *ejusdem generis* rule. The *Malo* court stated at 930:

> Provisions in a statute are to be read in the context of the statute as a whole. Applying these principles of statutory construction to the present statute, we hold that the general term "or other person" is restricted by the word "employer," "employment agency" and "labor union." The

> section, read as a whole, is directed at entities functionally similar to employers who discriminate by engaging in conduct similar to discharging or expelling a person who has opposed practices forbidden by RCW 49.60.

The federal district court followed *Malo* in *Owa v. Fred Meyer Stores,* 2017 WL 897808, *2 (W.D.Wash. 2017) (citing *Malo* and "confirming that the term 'or other person' is restricted by the words 'employer,' 'employment agency,' and 'labor union.'").

G. THE LEGISLATIVE HISTORY DOES NOT SUGGEST THAT THE LEGISLATURE INTENDED TO CREATE A NEW RETALIATION CAUSE OF ACTION.

Amici asserted that before the 1985 amendment "there is no indication that [former 49.60.210(1)] would have precluded a claim against a prospective employer." (Brief of Amici at 17.) The statute previously read that is was "an unfair practice for any employer . . . to discharge, expel or otherwise discriminate against any person" due to protected activity. The former statute would not have created a cause of action under the facts of this case because the District was never Mr. Zhu's employer. Throughout this case, Plaintiff has argued that the District is liable under the statute at issue because there was alleged discrimination by a "person" (one or more employees of the District) against a "person" (Mr. Zhu).

Amici also argued: "Silence in the legislative history . . . does not warrant overriding the mandate to liberally construe WLAD provisions." (*Id.*) Silence in the legislative history indicates that the Legislature did not intend to create a new retaliation cause of action. "[I]t is not the function of the courts to substitute their evaluation of legislative facts for that of the legislature." *Minnesota v. Clover Leaf Creamery Co.*, 449 U.S. 456, 470 (1981). "[C]ourts do not substitute their social and economic beliefs for the judgment of legislative bodies, who are elected to pass laws." *Ferguson v. Skrupa*, 372 U.S. 726, 730 (1963). "It is not the role of the judiciary to second-guess the wisdom of the legislature . . . ." *Rousso v. State*, 170 Wn.2d 70, 75, 239 P.3d 1084 (2010).

Amici admits **"there is no express statement that § .210(1) was intended to apply to prospective employers . . . ."** (Brief of Amici at 18.) Amici alleges that "the legislative history does evidence an intent to significantly expand § .210(1) to a variety of contexts . . . ." (*Id.*) The legislative history does not evidence any intent to apply the anti-retaliation statute to the facts as involved in this case.

The WLAD is a creature of the Legislature. This Court has traditionally deferred to the Legislature for the creation of new causes of action. *Burkhart v. Harrod*, 110 Wn.2d 381, 385-86, 755 P.2d 759 (1988); *Duncan v. Northwest Airlines, Inc.*, 203 F.R.D. 601, 605

(W.D.Wash. 2001). The Legislature has a "greater ability to fully explore the spectrum of competing societal interests," while the judiciary "is the least capable of receiving public input and resolving broad public policy questions based on a societal consensus." *Burkhart*, 110 Wn.2d at 382.[1] Moreover, "a plaintiff seeking to maintain a cause of action not previously recognized bears a heavy burden of demonstrating that it should be recognized." 1 Am.Jur.2d § 37 (2d ed. – updated Aug. 2017).

See also the District's argument at pp. 7-12 of the District's opening brief and at pp. 8-9 of the District's reply brief.

H. IT IS PURE SPECULATION THAT A WASHINGTON EMPLOYEE WILL REFRAIN FROM EXERCISING HER OR HIS RIGHT TO FILE A DISCRIMINATION LAWSUIT BECAUSE OF A FEAR THAT IT WILL CAUSE A PROSPECTIVE EMPLOYER IN THE FUTURE TO REJECT HER OR HIS APPLICATION FOR EMPLOYMENT.

Amici asserted: "Permitting prospective employers to discriminate against applicants in this context would discourage victims of discrimination from bringing private actions." (Brief of Amici at 19.) This assertion is pure speculation and is not grounds for creating a retaliation cause of action that was not intended by the Legislature. No experienced employment law lawyer, when presented with a meritorious

[1] This Court sometimes has chosen to recognize new causes of action. *E.g.*, *Roberts v. Dudley*, 140 Wn.2d 58, 63, 993 P.2d 901 (2000) (wrongful discharge in

case of discrimination under the WLAD, would advise her or his client to forego a lawsuit because at some unspecified time in the future a prospective employer might decline to hire the person.

In footnote 9, Amici cited *Burlington Northern and Santa Fe Fy. Co. v. White*, 548 U.S. 53 (2006), which was a Title VII retaliation claim made by **an employee against her own employer.** The Court stated at 67: "The scope of the antiretaliation provision extends beyond workplace-related or employment-related retaliatory acts and harms." The Court also held that it was a question of fact for the jury to determine whether a 37-day suspension from employment by plaintiff's own employer constituted a materially adverse employment action. *Id.* at 72-73.

Failure to hire is not an adverse employment action -- In footnote 10, Amici set forth its entire argument that a failure to hire is an "adverse employment action." Amici argued: "To the extent an 'adverse employment action' is required in Washington, refusal to hire **would certainly seem** to qualify." (*Id.*) (Emphasis added.)

Amici cited two disparate treatment claims that did not involve the retaliation statute at issue. In *Scrivener v. Clark College*, 181 Wn.2d 439, 334 P.3d 541 (2014) (plaintiff claimed that she did not receive tenure-track positions at a college due to her age), which alleged disparate

---

violation of public policy); *Reid v. Pierce County*, 136 Wn.2d 195, 961 P.2d 333 (1998)

treatment due to age discrimination under RCW 49.60.180(1). In the refusal to hire context, RCW 49.60.180(1) specifically sets forth which protected classes are entitled to the protection of the statute. Amici also cited *Blackburn v. State,* 186 Wn.2d 250, 375 P.3d 1076 (2016) (plaintiffs alleged that the state used a racially discriminatory staffing directive), which was alleged disparate treatment due to race under RCW 49.60.180(3). The statute involves discrimination "in compensation or in other terms or conditions of employment" due to membership in protected classes such as "age, sex, marital status, sexual orientation, race, creed, color [and] national origin . . . ."

I. CONCLUSION

The Court should find that in amending the statute at issue in 1985 the Legislature did not intend to create a retaliation cause of action in favor of a job applicant based upon the job applicant's protected activity while working for a previous employer.

RESPECTFULLY SUBMITTED this 22nd day of August, 2017.

JERRY MOBERG & ASSOCIATES, P.S.

s/ Jerry J. Moberg
JERRY J. MOBERG, WSBA No. 5282

(invasion of privacy).

s/ James E. Baker
JAMES E. BAKER, WSBA No. 9459

P.O. Box 130 – 124 3rd Avenue S.W.
Ephrata, WA 98823
Telephone: (509) 754-2356
Fax: (509) 754-4202
Email: jmoberg@jmlawps.com
Email: jbaker@jmlawps.com
Per GR 30(d)(2)

CERTIFICATE OF SERVICE

I certify that on this date I emailed a copy of this brief to:

Matthew Z. Crotty, attorney for Plaintiff
matt@crottyandson.com

Andrew S. Biviano, attorney for Plaintiff
abiviano@pt-law.com

Michael B. Love, attorney for Plaintiff
mike@michaellovelaw.com

Jeffrey L. Needle, attorney for amicus curiae WELA
jneedle1@wolfnet.com

Jesse A. Wing, attorney for amicus curiae WELA
jessew@mhb.com

Samuel J. L. Kemper, attorney for amicus curiae WELA
samk@mhb.com

Daniel F. Johnson, attorney for amicus curiae WELA
djohnson@bjtlegal.com

Valerie D. McOmie, attorney for amicus curiae WSAJF
valeriemcomie@gmail.com

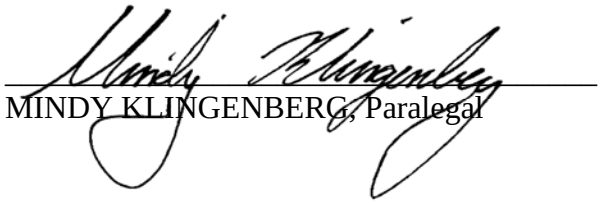
Daniel E. Huntington, attorney for amicus curiae WSAJF
danhuntington@richter-wimberly.com

Rabi Lahiri, attorney for amicus curiae ACLU
rabi.lahiri@gmail.com

Nancy L. Talner, attorney for amicus curiae ACLU
talner@aclu-wa.org

DATED this 22nd day of August, 2017 at Ephrata, WA.

JERRY MOBERG & ASSOCIATES, P.S.



MINDY KLINGENBERG, Paralegal

JERRY MOBERG & ASSOCIATES, P.S.

August 22, 2017 - 4:13 PM

Transmittal Information

Filed with Court:	Supreme Court
Appellate Court Case Number:	94209-9
Appellate Court Case Title:	Jin Zhu v. North Central Educational Service District - ESD 171

The following documents have been uploaded:

- 942099_Other_20170822161310SC151814_1395.pdf
  This File Contains:
  Other - Response to Amicus of WSAJF
  The Original File Name was Response to Amicus of WSAJF.pdf

A copy of the uploaded files will be sent to:

- abiviano@pt-law.com
- bonitaf@richter-wimberley.com
- danhuntington@richter-wimberley.com
- djohnson@bjtlegal.com
- esmeraldav@mhb.com
- jbaker@jmlawps.com
- jessew@mhb.com
- jtelegin@bjtlegal.com
- matt@crottyandson.com
- matthew.z.crotty@msn.com
- mike@michaellovelaw.com
- rabi.lahiri@gmail.com
- samk@mhb.com
- talner@aclu-wa.org
- valeriemcomie@gmail.com

Comments:

Sender Name: Mindy Klingenberg - Email: mklingenberg@jmlawps.com
Filing on Behalf of: Gerald John Moberg - Email: jmoberg@jmlawps.com (Alternate Email:)

Address:
PO Box 130
Ephrata, WA, 98823
Phone: (509) 754-2356

Note: The Filing Id is 20170822161310SC151814